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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

This Document Relates to:

*Crago d/b/a Dash Computers, Inc., et al., on
its own behalf and on behalf of similarly
situated parties,*

Plaintiffs,

v.

Mitsubishi Electric Corporation, et al.,

*Defendants.
Defendants.*

MDL No. 1917

Master File No. 3:07-cv-05944-JST
Case No. 3:14-cv-02058-JST

**DECLARATION OF GABRIEL A.
FUENTES IN SUPPORT OF
MITSUBISHI ELECTRIC
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PRUSUANT TO CIVIL LOCAL RULES
7-11 AND 79-5**

Judge: Hon. Jon S. Tigar
Court: Courtroom 9, 19th Floor
Date: 10 a.m., June 9, 2016

I, Gabriel A. Fuentes, hereby declare as follows:

1. I am a Partner with the law firm of Jenner & Block LLP, counsel for Mitsubishi Electric Corporation, Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual Solutions America, Inc. (collectively, the "Mitsubishi Electric Defendants"). I am an attorney licensed to practice law in the State of Illinois and was granted leave to appear *pro hac vice* in this litigation.

2. I submit this Declaration in support of the Mitsubishi Electric Defendants' Administrative Motion to File Under Seal pursuant to Civil Local Rules 7-11 and 79-5. I have personal knowledge of the matter set forth herein. If called as a witness, I could and would testify competently to them.

3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter. ECF No. 306 (“Stipulated Protective Order”).

4. Pursuant to Civil Local Rules 7-11 and 79-5, the Mitsubishi Electric Defendants respectfully request to file under seal a portion of the **REPLY IN SUPPORT OF MITUSBISHI ELECTRIC DEFENDANTS’ MOTION TO SET TRIAL DATE** (“Reply”).

Reply Page Nos.	Description	Designating Party
1-2	Excerpt from Dr. Jeffery Leitzinger’s Expert Report, ECF No. 2969-1 at ¶ 83, November 7, 2014.	Direct Purchaser Plaintiffs (“DPPs”)

5. The aforementioned portion of the Reply that the Mitsubishi Electric Defendants seek to file under seal contains material designated as “Confidential” or “Highly Confidential” by the DPPs (the “Designating Party”) pursuant to the Stipulated Protective Order governing this action. *See* ECF No. 306. As a result, it must be submitted under seal pursuant to Civil Local Rule 79-5(e). To maintain the documents under seal, within four days of the administrative motion to seal’s filing, the designating party must file a declaration establishing that the designated material is sealable.

6. The Mitsubishi Electric Defendants seek to submit the aforementioned portion of the Reply under seal in good faith to comply with the Stipulated Protective Order, the Honorable Jon S. Tigar’s Standing Order Governing Administrative Motions to File Materials Under Seal, and Civil Local Rules 7-11 and 79-5. Because the documents that the Mitsubishi Electric Defendants seek to submit under seal have been designated as “Confidential” or “Highly Confidential” by the Designating Party, the Mitsubishi Electric Defendants file the accompanying Administrative Motion to File Documents Under Seal, and will be prepared to file unredacted versions of the aforementioned documents in the public record if required by Civil Local Rule 79-5(e).

By: /s/ Gabriel A. Fuentes
Gabriel A. Fuentes